

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**THE HANOVER INSURANCE COMPANY,**

**CASE NO.: 23-CV-80829-RLR**

Petitioner,

v.

**HARRY J. ROSS,  
ANDREA ZIDE, and  
STRACHUR WORLDWIDE LTD.,**

Respondents.

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**RESPONDENT'S 30(b)(6) REQUEST FOR A CORPORATE REPRESENTATIVE  
WITH KNOWLEDGE**

COMES NOW Respondents, ANDREA ZIDE and STRACHUR WORLDWIDE, LTD.,  
by and through undersigned counsel and serves this 30(b)(6) Request for a Corporate  
Representative with Knowledge of the following:

1. Hanover's policies and procedures concerning the two exclusions cited by Hanover in its complaint.
2. Familiarity with all Hanover cases in the last seven (7) years whereby Hanover evoked these coverage defenses.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 29<sup>th</sup> day of October 2023, that a true and correct copy  
of the foregoing was filed with the Court through the use of the Florida Courts eFiling ePortal in

Case 9:23-cv-80829-RLR. Document has been served upon all parties via the Florida Courts eFiling ePortal eService in accordance with rule 2.516, Florida Rules of Judicial Administration.

Respectfully submitted this 29<sup>th</sup> day of October 2023.

By: /s/ Robert I. Rubin  
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